

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-30014-MAP

THE MERCY HOSPITAL, INC.,)
Plaintiff)
v.)
MASSACHUSETTS NURSES)
ASSOCIATION,)
Defendant)

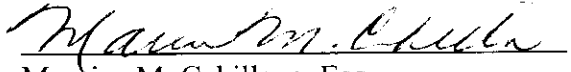
MOTION FOR EXTENSION OF TIME
FOR FILING OF SUMMARY
JUDGMENT MOTION AND BRIEF

Now comes the plaintiff and moves for additional time to file its Motion for Summary Judgment and as grounds therefor states:

1. Counsel for the plaintiff was called for two consecutive trials in Hampden County Superior Court this week (Blankenship vs. Integrated Travel Solutions, Inc. and Hodge vs. Roman Catholic Bishop of Springfield) and the second trial was scheduled to commence today, June 10, 2004. Argument on motions began but have been delayed until Tuesday, June 15th, at which time the trial could recommence. The brief is presently scheduled to be due on June 15th. Counsel also has a vacation scheduled between June 21 and June 26 and, therefore, requests an extension of time until June 30, 2004, to file his motion.
2. Counsel for the plaintiff certifies that he conferred with counsel for the defendant and have attempted to in good faith to resolve or narrow the issue.
3. Counsel for the defendant has not assented to the motion.

THE PLAINTIFF
BY ITS ATTORNEY

Date: June 14, 2004


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this 14th day of June, 2004, on all parties, by First Class Mail, postage prepaid, to:

Mark A. Hickernell, Esquire
McDonald & Associates
Cordaville Office Center
153 Cordaville Road, Suite 210
Southborough, MA 01772


Maurice M. Cahillane